

EXHIBIT D

Bonner, Kelly

From: Adam Slater <ASlater@mazieslater.com>
Sent: Friday, February 26, 2021 9:37 AM
To: Hill, Coleen W.
Cc: Murray, Alem-Sayie T.; Priselac, Jessica; Goldberg, Seth A.; Bonner, Kelly; Cheryl Calderon; Christopher Geddis; George T. Williamson; 'valpec@kirtlandpackard.com'
Subject: Re: Lijie Wang, Ph.D. - 01.26.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation MDL No. 2875 (FINAL Transcript)

Coleen:

Plaintiffs hereby challenge the confidentiality designations for the Lijie Wang deposition. The documents and testimony designated by you do not in any instance rise to the level of sensitivity required to justify confidential treatment under the law or the terms of the protective order. This analysis applies to each designation. In addition, this deposition is focused on a significant public health problem, which must be taken into account in weighing any asserted interest in confidentiality, which appears not to have been taken into account in your assertion of confidentiality designations.

Pursuant to the protective order please advise whether you wish to meet and confer on any of the designations, and if not please confirm so we can gauge any waiver of confidentiality under the protective order.

Thank you,

Adam Slater

From: Hill, Coleen W. <CWHill@duanemorris.com>
Sent: Thursday, February 25, 2021 3:44 PM
To: 'Production_glkw' <Production@golkow.com>
Cc: Finals <Finals@golkow.com>; Exhibits_glkw <exhibits2@litigationservices.com>; Murray, Alem-Sayie T. <ATMurray@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Bonner, Kelly <KABonner@duanemorris.com>; Adam Slater <ASlater@mazieslater.com>; Cheryl Calderon <ccalderon@mazieslater.com>; Christopher Geddis <CGeddis@mazieslater.com>; George T. Williamson <gwilliamson@farr.com>; 'valpec@kirtlandpackard.com' <valpec@kirtlandpackard.com>
Subject: RE: Lijie Wang, Ph.D. - 01.26.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation MDL No. 2875 (FINAL Transcript)

Hello,

Attached please find Dr. Lijie Wang's signature page and Errata sheet for her final deposition transcript. Also, pursuant to the Fact Witness Deposition Protocol (CMO No. 20, ECF No. 632) and the Confidentiality and Protective Order (ECF No. 139) ("Protective Order") entered in the above-captioned action, attached please find the confidentiality designations for the Lijie Wang deposition transcript and exhibits.

Please note the following error with the final transcript of Dr. Lijie Wang, which we have raised with Golkow and are working to resolve: Exhibit 42 is mentioned on page 267 and discussed on pages 269-270; however, there is no marked

Exhibit 42 from this deposition, and the Bates numbers of ZHP-42 (used in a prior deposition) do not match the Bates numbers referenced in Dr. Wang's transcript. Until this issue is resolved, Dr. Lijie Wang's transcript should not be considered final.

Further, pursuant to Paragraph 18 of the Protective Order, the ZHP Parties hereby re-designate ZHP-49, ZHP-57, ZHP-58, ZHP-59, ZHP-60, ZHP-61, ZHP-71, ZHP-79, and ZHP-84 as RESTRICTED CONFIDENTIAL INFORMATION. The ZHP Parties will be producing the re-designated documents in accordance with Paragraph 18 of the Protective Order.

For Golkow's purposes, shortly you will receive (via our firm's secure file delivery system) copies of ZHP-49, ZHP-57, ZHP-58, ZHP-59, ZHP-60, ZHP-61, ZHP-71, ZHP-79, and ZHP-84 to which we have affixed the legend "RESTRICTED CONFIDENTIAL INFORMATION." We have also affixed the legend "RESTRICTED CONFIDENTIAL INFORMATION" to marked ZHP-86; this document was used during the deposition in its native form and therefore did not reflect its confidentiality designation.

Golkow, please let us know if you need us to follow some other process for marking these exhibits with their confidentiality designation.

Thank you,
Coleen

Coleen W. Hill
Associate

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From: Production_glkw <Production@golkow.com>

Sent: Saturday, January 30, 2021 9:53 AM

To: Murray, Alem-Sayie T. <ATMMurray@duanemorris.com>; Hill, Coleen W. <CWHill@duanemorris.com>; Schwartz, Barbara <BASchwartz@duanemorris.com>; Priselac, Jessica <JPriselac@duanemorris.com>; Reeder, Nathan B. <NBReeder@duanemorris.com>

Cc: Finals <Finals@golkow.com>; Exhibits_glkw <exhibits2@litigationservices.com>

Subject: Lijie Wang, Ph.D. - 01.26.21 - Valsartan, Losartan, and Irbesartan Products Liability Litigation MDL No. 2875 (FINAL Transcript)

Please find attached the FINAL e-transcript and PDF bundle transcript of Lijie Wang, Ph.D.

Kindly note the exhibits are not yet available. We will send them in a separate email as soon as they're available.

If we can be of any further assistance in this matter, please do not hesitate to contact us.

Thank you,

Kristie Martello
Supervisor of Case Management
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Philadelphia, Pennsylvania 19103

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In light of the Coronavirus pandemic and in an effort to keep our clients and staff safe, Golkow Litigation Services is modifying our production of hard copy materials. Printed transcripts/exhibits will ONLY be produced upon request. As always, we thank you for your continued support and understanding and hope you remain safe and well.

For more information about Duane Morris, please visit <http://www.DuaneMorris.com>

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